



Ex Parte Filing

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: CC Docket No. 95-155 Toll Free Service Access Codes;
CC Docket No. 96-115 Telecommunications Carrier's Use Of Customer
Proprietary Network Information And Other Customer Information
CC Docket No. 17-192 Toll Free Assignment Modernization
CC Docket No. OEA 19-101 Auction of Toll Free Numbers in the 833 Code

Dear Ms. Dortch:

On July 23, 2019 the undersigned of Ignition Toll Free met (via telephonic bridge) with the following members of the Wireline Competition Bureau:

- Kris Monteith, Bureau Chief
- Pamela Arluk, Chief, Competition Policy Division,
- Heather Hendrickson, Assistant Division Chief
- Alex Espinoza, Attorney Advisor
- Matt Collins, Attorney Advisor
- Lisa Hone, Deputy Bureau Chief
- Connor Ferraro, Attorney Advisor

The purpose of the teleconference was to provide additional information related to a teleconference that was held on April 4, 2019 (See [Ex Parte 4/4/19](#)).

The following items were discussed during this teleconference:

Lack of location data is impacting Public Safety/Health and Human services:
With regards to real-time geographic call routing of phone calls, currently no entities are receiving any form of location data, including those related to public safety. Specific examples include groups related to suicide prevention and poison control. These groups have indicated that having access to coarse/imprecise location data would remove two steps from their current call flow and significantly reduce the time needed to connect callers to their nearest emergency dispatch center.



A Public Safety/Health Human Services Exception for Location Data would not adequately protect the public: Such an exception would omit many legitimate use cases that protect the public. For example, a company that specializes in roadside assistance would not qualify for such an exception even though the speed in which their calls are connected could be just as important.

Coarse/Imprecise location data should be made available for the limited purpose of routing calls: Coarse/imprecise location data does not reveal a caller's location with enough granularity to violate a reasonable expectation of privacy and as a result it should be made available for the limited purpose of routing calls.

Lack of coarse/imprecise location data will impact the success of the 833 auction: Toll free numbers are less valuable since coarse/imprecise location data has been removed. The inability to geographically route callers reduces the utility of toll-free numbers. This lack of functionality will result in fewer entities participating in the auction and lower valuations of the 833 numbers up for auction.

The Network Advertising Initiative Guidelines on Imprecise Location Data:

These guidelines provide helpful information to better understanding

Coarse/Imprecise Location data:

https://www.networkadvertising.org/sites/default/files/NAI_ImpreciseLocation.pdf

Our request to resolve this issue during the August Open Commission Meeting:

We are respectfully asked that the Chairman comment on this issue during the August Open Commission meeting indicating that the lack of coarse/imprecise location data negatively impacts the value of toll-free numbers by limiting their utility and that the wireless carriers should make it available for the limited purpose of routing calls. Not having coarse/imprecise location data will result in millions of calls not reaching their proper destination every year. The failure to properly route callers to the appropriate destination will destroy American's faith in our nation's telecommunication's network.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruno Tabbi, Jr.", is written over a light blue horizontal line.

Bruno Tabbi, Jr.

cc (via email):

Kris Monteith, Bureau Chief



Pamela Arluk, Chief, Competition Policy Division,
Heather Hendrickson, Assistant Division Chief
Alex Espinoza, Attorney Advisor
Matt Collins, Attorney Advisor
Lisa Hone, Deputy Bureau Chief
Connor Ferraro, Attorney Advisor